Relay Oklahoma FCC Certification Renewal and Supporting Documents

Introduction

Relay Oklahoma, a program under the Oklahoma Telephone Association by Oklahoma Corporate Commission, State of Oklahoma, has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 12-1187, CG Docket No. 03-123** released on July 25, 2012. Included in the Public Notice are the minimum mandatory FCC TRS requirements under **47 C.F.R. §64.604 and §64.606.** A copy of this Public Notice and these mandatory requirements is attached as **Appendix A.** Relay Oklahoma prepared this TRS Certification Renewal Application with the assistance of Sprint Relay.

Oklahoma contracted with Sprint to provide Telecommunications Relay Service effective November 15, 2011 to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the RFP that was issued May 2011. All of the minimum mandatory TRS requirements are listed in the RFP and attached as **Appendix K.** Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, Relay Oklahoma does not contract to provide these services in Oklahoma, nor is Relay Oklahoma responsible for oversight of IP and VRS or other Internet or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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Appendices

Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

<u>**CA Employment Standards**</u>

Relay Oklahoma contracts with Sprint to provide the hiring, training and oversight of Communication Assistants for Relay Oklahoma. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a twelfth-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language, or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history.

After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.

Sprint TRS CA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment.

Sprint TRS CA applicants must pass a valid unbiased 12th grade level grammar test to be considered for employment.

Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality.

If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures that only qualified applicants are hired to work at Sprint Relay centers as a CA.

Sprint provides an enhanced VCO service called Captioned Telephone (*CapTel*) Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures that all *CapTel* Operators are sufficiently trained to meet the needs of *CapTel* users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. *CapTel* Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for *CapTel* calls.

- *CapTel* Operator Trainees spend 2 to 3 weeks training in a classroom setting.

- There is a final proficiency exam that must be passed in order to move into a live call environment.

- Upon completion of classroom training, *CapTel* Operators are scheduled for one-week of transition training, while being monitored and supported by another *CapTel* Operator or an Instructor.

- All *CapTel* Operators must continue to qualify for live call handling each month.

- Sprint *CapTel* Operators are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.

- Each *CapTel* Operator is evaluated on a minimum of one call each shift.

- There is also a monthly test that each *CapTel* Operator must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Relay Oklahoma, through their contract with Sprint, has shown that that Sprint CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Type 60 WPM prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.

- Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint's diversified culture program training includes the

characteristics of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.

- Demonstrate a professional and courteous phone image

- Process calls using live training terminals in an efficient and knowledgeable manner

- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide *Speech-to-Speech* (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA

- Recommendation and/or approval from supervisor or manager

- Attend and complete specialized *Speech-to-Speech* training program including a written evaluation.

- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary

- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on Speech-to-Speech Services.   Sprint's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Values and Goals	
♦ **Training Agenda**	♦
▪ Objectives / Training Outline ▪ Introduction and History ▪ Video ▪ Service Description ▪ Characteristics of Customers ▪ Stereotypes	▪ Speech-Disabilities ▪ Attributes of Speech-to-Speech Relay CAs ▪ Speech-to-Speech verses Traditional Relay ▪ FCC Requirements ▪ Speech-to-Speech Variations ▪ Assessment
♦ **Work Performance Components**	♦
▪ Basic Call Processing	▪ Confidentiality

STS TRAINING OUTLINE	
Sprint Values and Goals	
- Call set up - Customer Database - Frequently Dialed Numbers - Customer Requests - Emergency Call Processing	- Transparency - Personal Conversations - Developmental Skill Practice - Audio - Observation
◆ **Participation**	◆
- CA training - Taking over calls – 15 minute - CA work performance	- Call Focus - Teamwork – support peer
◆ **Confidentiality and Transparency**	◆
- Discuss call speech patterns - Discuss techniques customer uses - Have two CAs on one call, if necessary or customer requests.	- Unacceptable to: - Have conversation regarding information discussed on calls - Discuss customers in general
◆ **Scheduling**	◆

All *CapTel* Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. *CapTel* Operator training provides familiarity with hearing, deaf, and speech-disabled cultures.

Personnel supporting *CapTel* have the requisite experience, expertise, skills, knowledge, training, and education to perform *CapTel* Services in a professional manner. *CapTel* Operator Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling

- Pronunciation

- Enunciation

- Reading Ability

- Vocabulary

- Error Recognition - *CapTel* Operators must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during *CapTel* calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

Please review the Sprint TRS, STS and *CapTel* Training outlines in Appendix B for more information on CA training requirements.

CA Quality Assurance Programs

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is

maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Relay does not develop training and consumer education programs for the telecommunications Relay service alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

Relay Oklahoma contracts with Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 words per minute (wpm), with at least 95% accuracy. In fact almost a third of Sprint's CAs type over 90 wpm!

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

Relay Oklahoma does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint, Relay Oklahoma (OKRS) exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken-over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of ten minutes include:

- The customer requests a CA of the opposite gender or different CA,

- End user verbal abuse or obscenity towards the CA

- Call requires a specialist (STS, Spanish, etc.)

- CA Illness

- At the request of the customer for any reason, and/or

- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of ten or fifteen minutes (for STS calls). These include:

- Shift change, and/or

- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.

- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:

    o Sprint attempts to honor any requests for a specific gender during call transitions.

    o The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

As stated in the section above (§64.604 (a)(1) (v)) Relay Oklahoma honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for *CapTel* CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. Relay Oklahoma uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer

- CA-initiated macros (44 macros)

- Function Keys (85 separate function keys)

- System-initiated macros

- On-line help panel

- Tone of voice pre-approved descriptions (almost 100)

- Automatic Error Correction Library (615 words)

- Background descriptions (over 250)

All of these features are available in all languages including English, Spanish.

CapTel is a transparent service. *CapTel* CAs transmits audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

As stated earlier, Relay Oklahoma contracts with Sprint to oversee all TRS CAs, including *CapTel* CAs for the State of Oklahoma.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Relay Oklahoma STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Relay Oklahoma's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:
- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Relay Oklahoma *CapTel* CAs must comply with the same rules that TRS follows regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *CapTel* CAs.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A *CapTel* CA may have problems, complaints or stress from handling the call. The *CapTel* CA may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all *CapTel* CAs understand and abide by the confidentiality policy. Any *CapTel* CA who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

STS Limited Exception of Retention of Information

At the request of a caller, Relay Oklahoma Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see Appendix C for the TRS Pledge of Confidentiality form.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Relay Oklahoma CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: Sprint puts control of the call with the users.
- CAs accepts their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understands the relay user is to remain in control of the call.
- CAs does not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken typed or heard.

At the request of the relay user, Relay Oklahoma CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten American Sign Language ("ASL") during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately

reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference.   A CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay Oklahoma *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Oklahoma does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

STS Facilitation of Communication

Relay Oklahoma STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Oklahoma STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands that each STS user may also find one technique to be most comfortable. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

Relay Oklahoma STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase

- STS CAs may ask "yes" or "no" questions

- STS CAs may ask the STS user to use the word in another sentence

- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word

- STS CA may ask the user to spell the word

To ensure that STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call

processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Relay Oklahoma provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Relay Oklahoma also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Relay Oklahoma retain full control of the length and number of calls placed anytime through relay.

Relay Oklahoma *CapTel* CAs are currently waived by the FCC for outbound calls because the *CapTel* CA is not involved in the call set up and cannot refuse the call *CapTel* users dial sequential calls directly therefore it is not possible for a *CapTel* CA to refuse sequential calls or limit length of calls.

Relay Oklahoma *CapTel* CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. Please see Appendix D for a copy of the COC invitational letter sent to carriers.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

Relay Oklahoma, through Sprint, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Relay Oklahoma will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and *CapTel* users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Relay Oklahoma gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Relay Oklahoma works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

§64.604 (3) (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

If a long distance provider declines to complete a call because credit authorization is denied, Sprint will relay the message verbatim to the relay user and follow the user's instructions.

§64.604 (3) (iv)Relay services shall be capable of handling pay-per-call calls.

Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to Relay Oklahoma access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Currently, Relay Oklahoma users may make 900 calls through 1-900-230-4041.

Because 900 blocking information is not available with *CapTel* phones, *CapTel* users who wish to place pay-per-calls from the *CapTel* phone must update their Customer Profile form to allow these calls.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Relay Oklahoma provides access to all available relay call types. Through the state's contact with Sprint, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by Relay Oklahoma:

- Text-to-Voice (TTY to Voice)

- Voice-to-Text (Voice to TTY)

- VCO Attribute-Based Routing

- VCO with Privacy/No GA

- VCO Branding

- Standardized or personalized VCO call announcement and explanation

- Two-Line VCO

- VCO-to-HCO

- VCO-to-TTY

- VCO-to-VCO

- Reverse Two-Line VCO

- Voice Call Progression

- HCO with Privacy

- HCO Branding

- Standardized or personalized HCO call announcement and explanation

- Two-Line HCO

- Reverse Two-Line HCO

- HCO-to-VCO

- HCO to TTY

Except where waived by the FCC, Relay Oklahoma *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

Relay Oklahoma's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

Relay Oklahoma adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Speed Dialing Functionality

Relay Oklahoma speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the

CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Relay Oklahoma provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her Local Exchange Carriers (LECs) can use this feature when placing a call through Relay Oklahoma. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

Relay Oklahoma provides three-way calling for *CapTel* users that is in full compliance with FCC requirements. Two-line *CapTel* users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line *CapTel* users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national *CapTel* number and enter the *CapTel* user's telephone number. *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Relay Oklahoma, through Sprint, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint's hot key sends text to the user which says "(RECORDING)." Sprint's hot keys are available in all supported languages, including English, Spanish.

Relay Oklahoma has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Relay Oklahoma does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

Relay Oklahoma *CapTel* users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Retrieving Answering Machine and Voice Mail Messages

Relay Oklahoma has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint's Phoenix platforms, CAs is able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.

- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint will use the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).

- If necessary, Relay Oklahoma CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call so the end user is not imposed charges for additional calls. If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call.

- Sprint's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).

- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Like TRS users, Relay Oklahoma *CapTel* users can retrieve answering machine messages from an answering machine that is near the *CapTel* phone. However, the *CapTel* user will need to follow instructions that are slightly different than TRS users including the following:

- Press the *CapTel* menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)

- Press the "OK" button.

- Pick up the handset and place it near the answering machine.

- Watch the *CapTel* display to see when the *CapTel* CA is connected.

- Press the "play" button on the answering machine.

- View the captions on the *CapTel* display.

- Save, delete or navigate to the next message using the answering machine controls.

- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the *CapTel* user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Relay Oklahoma accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Relay Oklahoma has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Relay Oklahoma uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	Relay Oklahoma CAs act upon the word "emergency". Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., "hot key") which designates the call as an Emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Oklahoma Relay Service. They are calling from (caller's telephone number). This is CA # 1234, one moment please."
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON LINE NOW)" and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through their contract with Sprint, Relay Oklahoma has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line *CapTel* phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

The *CapTel* phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The *CapTel* Call Center is not engaged in processing 911 calls.)

The *CapTel* phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.

The user will be connected to the proper 911 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.

The 911 system renders the appropriate emergency response.

Two-Line *CapTel* Emergency Calling

Because Two-Line *CapTel* uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line *CapTel* user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Relay Oklahoma CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures.

Supervisors or Operations Administrators are available 24/7/365 to assist CAs when an emergency call occurs. CAs also has immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Centers
If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint ALWAYS connects the caller to the POLICE. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls
If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: **"*You have connected to a telephone relay service for the deaf and hard-***

of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance."

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Relay Oklahoma offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Relay Oklahoma's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated ten-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Relay Oklahoma does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this

section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Relay Oklahoma does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Relay Oklahoma contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use.

Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected.

Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA.   If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Relay Oklahoma contracts with Sprint, who currently has ten (10) TRS and *CapTel* centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and *CapTel* calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

> Initial CA requirement for each 15-minute period of the day
> Total number of CAs scheduled for each-15 minute period
> The number of CAs over or under the requirement needed to meet forecast call volumes
> Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that

Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.

Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the Relay Oklahoma contract with Sprint is that 85% of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Relay Oklahoma's *CapTel* speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within 10 seconds.

Relay Oklahoma expects that Sprint will continue to review TRS and *CapTel* data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a Network forecast for each upcoming scheduling week.

Sprint also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures that total network traffic is accounted for by each of the centers.

By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Relay Oklahoma considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Through its contract with Sprint, Relay Oklahoma includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to Relay Oklahoma on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Relay Oklahoma, through its TRS contract with Sprint, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each Oklahoma relay toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Relay Oklahoma does not oversee VRS services, nor contracts with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Relay Oklahoma TRS and *CapTel* users have equal access to their chosen inter-exchange carrier through Relay to the same extent access is provided to voice users.

TRS and *CapTel* users are encouraged to register their preferred Carrier-of-Choice with Customer Service. Users who have not registered their preferred Carrier-of-Choice are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new *CapTel* phones come with a Carrier-of-Choice card packaged with the equipment. Users are responsible for filling out the card or contacting *CapTel* Customer Service to receive the benefits of registering their Carrier-of-Choice preferences for *CapTel* calls.

Voice-in users calling *CapTel* users are also notified that their call may incur long distance charges. After connecting to the *CapTel* voice-in Voice Response Unit (VRU) and entering the phone number of the *CapTel* user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

Relay Oklahoma relies on Sprint to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint routes calls to the designated carrier in as efficient a manner as possible. Sprint includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.) Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint encourages all Carriers to participate in its Carrier of Choice ("COC") program. When the requested Carrier is not a COC participant, Sprint Relay has established a procedure where the Carrier is notified, verbally and in writing, of its obligation to provide access to relay users and encourage their participation.

Outlined below is the process used by CAs to process Carrier-of-Choice calls and subsequent instructions to relay callers:

- Sprint Relay CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase:
  "I AM SORRY (carrier) DOES NOT ALLOWS (billing method) CALLS OVER THEIR NETWORK."

- The user may choose to have another Carrier handle the call. Sprint Relay then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint currently has 240 carriers participating in the Sprint Relay's TRS Carrier-of-Choice program. Participation of Carriers in Oklahoma is dependent on whether carrier is authorized to provide service in Oklahoma and connectivity to the Sprint Access Tandem.

10-10-220 Telecom USA	Century Solutions
10-10-220 Telecom USA	Coastal Telephone Co.
10-10-321 QWest	Cox Communications
10-10-502 WorldxChange	Global Crossing
10-10-636 Clear Choice	LDDS
10-10-752 EXCEL	MCIWorldCom
10-10-881 Vartec	McLeod USA
10-10-834 WorldxChange	Metromedia
10-10-987	OPEX LD
AT&T	SBC Long Distance
All Others	Sprint
Broadwing Communications	TDS Telecom
Broadwing Telecom	Verizon LD
CP Telecom	Witel
CenturyLink	Working Assets
CenturyTel Long Distance	WorldCom

Please see Appendix D for a copy of the COC invitational letter sent to carriers.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Relay Oklahoma and Sprint Relay Customer Service are both available 24 hours a day, every day of the year for all TRS services. Relay Oklahoma, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. *CapTel* Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Relay Oklahoma contracts with Sprint's Relay centers, which are equipped with an Uninterruptible Power Supply (UPS), generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Relay system and routes the calls to other operating call centers. Relay Oklahoma Relay customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

Please see Sprint's Disaster Recovery Plan and the Network Support Plan in Attachment E.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Relay Oklahoma does not oversee VRS services, or contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Relay Oklahoma does not oversee VRS services, or contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Relay Oklahoma through Sprint, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Relay Oklahoma will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Relay Oklahoma receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the State of Oklahoma, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

Wireless Access – STS (*787)

Sprint is excited to announce the first wireless short-code solution for STS users. Since early 2012, Sprint wireless customers have been able to dial *STS (i.e., *787) to reach a *Speech-to-Speech* CA quickly and easily from anywhere in the nation. All callers who are physically located within the state will automatically be connected to a Speech-to-Speech CA. This service is available to both callers with and without a speech disability, who need to place a STS call. Voice callers needing to place a call to a STS user may also use this service.

When Oklahoma TRS customers travel outside of the state, callers will be automatically connected to STS based on their physical location. If they are in a state where Sprint is the Relay provider, the caller is connected to the State's STS service. If not, callers are automatically transferred to Sprint's interstate STS Service, where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

In addition, Sprint has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Sprint will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay.
Please see the graphic below for the written Customer Profile form, which encourages STS users to register speed dial entries.

Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):
Note: Limit 30 characters per name

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, go to the **Additional Information** section on the page 3.*

STS with Privacy Option
Sprint offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information

Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

Emergency Numbers

In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Relay Oklahoma, through their contract with Sprint, provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information including blocking information, from all TRS users.

Customer Control

With Sprint's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis.

The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen.

With Sprint's Caller ID, there are numerous benefits for TRS users, including:

    Increased privacy
    Documentation of calls received
    A count of incoming calls on the display screen
    Phone numbers of hang-up callers
    Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology

Sprint Relay offers True Caller ID for all local and long distance calls to Carriers who have SS7 connectivity with Sprint. Sprint's SS7 network interfaces with all national long distance Carriers and major LECs, CLECs, and ILECs.

Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

Selective Call Acceptance

Selective Call Acceptance allows a user to create a list of phone numbers so that the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection

Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

Selective Call Forward

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information.   If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as:

"The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected."

This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voice mail. Realizing that not all users will be able to

hear this recording by the calling party, some companies have implemented additional enhancements outlined below:

Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

Caller's Access Code

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Relay Oklahoma has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

Relay Oklahoma works closely with their TRS provider (Sprint) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice or Speech-to-Speech), customer contact information (when given), CA identification numbers, the call handling center and over forty-five contact categories including: complaints, inquires and unsolicited commendations.

Sprint submits reports detailing the information above... Each report will include the following information:

Name of the complainant or commendation
The date of the contact, complaint or compliment
The nature of the complaint or comment
The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint's customer contact database.

Customer Contacts Online Database (CCOD)

To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD will automatically notify the TRS Sprint program manager assigned to the State of Oklahoma via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC

By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. Relay Oklahoma reviews the log and then passed the complaint log to the FCC by July 1st of each year.

See Appendix J for copies of the last five years of the Relay Oklahoma complaint logs that have been submitted to the FCC.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Relay Oklahoma callers may file intrastate complaints and commendations regarding Relay Oklahoma services through the following contacts:

Jeffrey L. Prail
900 South Shackleford Road, Suite 300, Little Rock, AR 72211
www.oklahomarelay.com
Jeffrey.prail@sprint.com
TTY: 501.221.3279
Fax: 501.221.3241

Voice: 501.221.1285
VP: 501.246.8227

Oklahoma Telephone Association

Bob Stafford, Executive Vice-President
3800 N. Classen Blvd, Ste 215, Oklahoma City, OK 73118
ota@brightok.net
www.oklata.org
Fax:405.525.7707
Voice:405.525.7700

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Relay Oklahoma Outreach continues the tradition to bringing awareness about the Relay service through the "Do Not Hang Up on Relay" and Relay Oklahoma *CapTel* campaign to the general population, Native American communities, and rural communities through such events as Health and Wellness fairs, Senior Expos, Vocational Rehabilitation Service collaborations, Oklahoma School for the Deaf events, and a local Deaf Organization Event. Relay Oklahoma has participated in a total of 39 events since November 2011 to September 1, 2012. (See Attachment G)

Relay Oklahoma has partnered with Oklahoma State University and University of Tulsa to conduct a public service announcement (PSA) on "Do Not Hang Up on Relay/" This 30 second radio PSA will broadcast to over 300,000 listeners, especially in the western part of rural Oklahoma. As part of the agreement with both universities, Relay Oklahoma advertisement will be placed in both of their game day magazines. (See Appendix H)

Relay Oklahoma receives feedback from a variety of stakeholders who are relay users as well as other community individuals with disabilities through the Relay Oklahoma Advisory Committee; Additional input on the Relay Oklahoma outreach programs is conducted through partnership with Oklahoma State University, University of Tulsa, Oklahoma City Redhawks, and the Oklahoma Indian Affairs Commission.

Please see copy on file, Appendix H

Advertising through flyers, e-mail notification, on the Relay Oklahoma website about services for Oklahoma relay users. Please see copy on file; Appendix H

One underrepresented population that Relay Oklahoma reaches out to includes the Oklahoma Native American Tribes. A comprehensive listing of Oklahoma Native American Tribes in the state of Oklahoma is listed below. Through Oklahoma Relay's outreach program, letters were sent to these tribal communities about Relay Oklahoma service and included the state's 7-1-1 brochure and information about *CapTel*.

ABSENTEE SHAWNEE TRIBE
George Blanchard, Governor
2025 S. Gordon Cooper Dr.
Shawnee, OK 74801
(405) 275-4030 FAX 275-5637
www.astribe.com

ALABAMA QUASSARTE TRIBAL TOWN
Tarpie Yargee, Chief
P.O. Box 187
Wetumka, OK 74883
(405) 452-3987 FAX 452-3968
www.alabama-quassarte.org

APACHE TRIBE
Louis Maynahonah, Chairman
P.O. Box 1330
Anadarko, OK 73005
(405) 247-9493 FAX 247-2686

CADDO NATION
Brenda Shemayme Edwards, Chairperson
P.O. Box 487
Binger, OK 73009
(405) 656-2344 FAX 656-2892
www.caddonation-nsn.gov

CHEROKEE NATION
Chad Smith, Principal Chief
P.O. Box 948
Tahlequah, OK 74465
(918) 456-0671 FAX 458-5580
www.cherokee.org

CHEYENNE & ARAPAHO TRIBES
Janice Boswell, Governor
P.O. Box 38
Concho, OK 73022
(405) 262-0345 FAX 422-7424
www.c-a-tribes.org

CHICKASAW NATION
Bill Anoatubby, Governor
P.O. Box 1548
Ada, OK 74821
(580) 436-2603 FAX
436-4287
www.chickasaw.net

CHOCTAW NATION
Greg E. Pyle, Chief
P.O. Drawer 1210
Durant, OK 74702
(580) 924-8280 FAX 924-1150
www.choctawnation.com

CITIZEN POTAWATOMI NATION
John A. Barrett, Chairman
1601 S. Gordon Cooper Dr.
Shawnee, OK 74801
(405) 275-3121 FAX 275-0198
www.potawatomi.org

COMANCHE NATION
Johnny Wauqua, Chairman
P.O. Box 908
Lawton, OK 73502
(580) 492-3240 FAX 492-3796
www.comanchenation.com

DELAWARE NATION
Kerry Holton, President
P.O. Box 825
Anadarko, OK 73005
(405) 247-2448 FAX 247-9393
www.delawarenation.com

DELAWARE TRIBE OF INDIANS
Paula Pechonick, Chief
170 NE Barbara
Bartlesville, OK 74006
(918) 336-5272 FAX 337-6591
www.delawaretribe.org

EASTERN SHAWNEE TRIBE
Glenna J. Wallace, Chief
P.O. Box 350
Seneca, MO 64865
(918) 666-2435 FAX 666-2186

FORT SILL APACHE TRIBE
Jeff Houser, Chairman
Route 2, Box 121
Apache, OK 73006
(580) 588-2298 FAX 588-3133
www.fortsillapache-nsn.gov

IOWA TRIBE
Janice Rowe-Kurak, Chairman
R.R. 1, Box 721
Perkins, OK 74059
(405) 547-2402 FAX 547-1032
www.iowanation.org

KAW NATION
Guy Munroe, Chairman/CEO
P.O. Box 50
Kaw City, OK 74641
(580) 269-2552 FAX 269-2301
www.kawnation.com

KIALEGEE TRIBAL TOWN
Tiger Hobia, Mekko
P.O. Box 332
Wetumka, OK 74883
(405) 452-3262 FAX 452-3413
www.kialegeetribaltown.net

KICKAPOO TRIBE
Gilbert Salazar, Chairman
P.O. Box 70
McLoud, OK 74851
(405) 964-7053 FAX 964-7065
www.kickapootribeofoklahoma.com

KIOWA TRIBE
Ronald Dawes Twohatchet, Chairman
P.O. Box 369
Carnegie, OK 73015
(580) 654-2300 FAX 654-2188
www.kiowatribe.net

MIAMI NATION
Tom Gamble, Chief
P.O. Box 1326
Miami, OK 74355
(918) 542-1445 FAX 542-7260
www.miamination.com

MODOC TRIBE
Bill Follis, Chief
418 "G" Street SE
Miami, OK 74354
(918) 542-1190 FAX 542-5415
www.modoctribe.net

MUSCOGEE (CREEK) NATION
A.D. Ellis, Principal Chief
P.O. Box 580
Okmulgee, OK 74447
(918) 756-8700 FAX 758-1434
www.muscogeenation-nsn.gov

OSAGE NATION
John Red Eagle, Principal Chief
813 Grandview
Pawhuska, OK 74056
(918) 287-5432 FAX 287-2257
www.osagetribe.com

OTOE-MISSOURIA TRIBE
John R. Shotton, Chairman
8151 Highway 177
Red Rock, OK 74651
(580) 723-4466 FAX 723-1015
www.omtribe.org

OTTAWA TRIBE
Ethel Cook, Chief
P.O. Box 110
Miami, OK 74355
(918) 540-1536 FAX
542-3214
www.ottawatribe.org

PAWNEE NATION
Marshall Gover,
President
P.O. Box 470
Pawnee, OK 74058
(918) 726-3621 FAX
762-6446
www.pawneenation.org

PEORIA TRIBE OF INDIANS
John P. Froman, Chief
P.O. Box 1527
Miami, OK 74355
(918) 540-2535 FAX 540-2538
www.peoriatribe.com

PONCA NATION
Douglas Rhodd,
Chairman
20 White Eagle Drive
Ponca City, OK 74601
(580) 762-8104 FAX
762-2743
www.ponca.com

QUAPAW TRIBE
John L. Berrey,
Chairman
P.O. Box 765
Quapaw, OK 74363
(918) 542-1853 FAX
542-4694
www.quapawtribe.com

SAC & FOX NATION
George Thurman, Principal
Chief
Route 2, Box 246
Stroud, OK 74079
(918) 968-3526 FAX 968-1142
www.sacandfoxnation-nsn.gov

SEMINOLE NATION
Leonard Harjo,
Principal Chief
P. O. Box 1498
Wewoka, OK 74884
(405) 257-7200 FAX
257-7209
www.seminolenation.com

SENECA-CAYUGA TRIBE
LeRoy Howard, Chief
P.O. Box 1283
Miami, OK 74355
(918) 542-6609 FAX
542-3684
www.sctribe.com

SHAWNEE TRIBE
Ron Sparkman, Chairman
P.O. Box 189
Miami, OK 74355
(918) 542-2441 FAX 542-2922
www.shawnee-tribe.com

THLOPTHLOCCO TRIBAL TOWN
George Scott, Mekko
P.O. Box 188
Okemah, OK 74859-0188
(918) 560-6198 FAX 560-6196

TONKAWA TRIBE
Donald Patterson, President
1 Rush Buffalo Rd.
Tonkawa, OK 74653
(580) 628-2561 FAX 628-3375
www.tonkawatribe.com

UNITED KEETOOWAH BAND OF CHEROKEES
George Wickliffe, Chief
P.O. Box 746
Tahlequah, OK 74465
(918) 431-1818 FAX 431-1873
www.keetoowahcherokee.org

WICHITA & AFFILIATED TRIBES
Leslie Standing, President
P.O. Box 729
Anadarko, OK 73005
(405) 247-2425 FAX 247-2430
www.wichitatribe.com

WYANDOTTE NATION
Billy Friend, Chief
64700 E. Hwy. 60
Wyandotte, OK 74370
(918) 678-2297 FAX 678-2944
www.wyandotte-nation.org

*HISTORIC TRIBE THAT HAVE FILED FOR FEDERAL RECOGNITION

*EUCHEE (YUCHI) TRIBE OF INDIANS
Andrew Skeeter, Chairman
P.O. Box 10
Sapulpa, OK 74067
(918) 224-3065 FAX 224-3065

In addition, a digital flyer on "Do Not Hang Up on Relay" was used at the Oklahoma City Shoppes Outlet Mall where it was displayed for six weeks with a series of rotating advertisements throughout the day on daily basis.

Please see copy on file, Appendix H

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

Relay Oklahoma users are not charged more for services than for those charges paid by standard "voice" telephone users. TRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the Relay Oklahoma COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All of the Relay Oklahoma intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate Telecommunications Relay Services (TRS) Fund (Fund) administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, states only receive a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement,

Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

The Oklahoma Telecommunications Relay Service (TRS) was established in order to comply with the Americans with Disabilities Act of 1990 (ADA). The TRS provided in Oklahoma is advertised under the name of Relay Oklahoma.

The Telecommunications for the Deaf and Hard-Of-Hearing Act *(OS. 63, $2417 et. seq.)* reference herein as "the Act" was passed by the Oklahoma State Legislature in 1986 authorizing the Department of Human Services to establish a telecommunications equipment distribution program and telephone message relay service for deaf and severely hearing impaired Oklahomans. The program was funded by a surcharge of five cents per local exchange telephone access line per month. This surcharge is collected by the Local Exchanges Carriers (LECs) in Oklahoma and remitted to the Oklahoma Tax Commission in accordance with the requirements of the Act.

In 1993, the Oklahoma Legislature created the Department of Rehabilitation Services (DRS) transferring Telecommunications for the Hearing-Impaired Act responsibilities from the Department of Human Services to DRS. In the summer of 1993, provisions of the Americans With Disabilities Act went into effect requiring telephone companies to assume responsibilities for telephone message relay service.

In 1994, The Oklahoma State Legislature amended the Telecommunications for the Deaf and Hard-Of -Hearing Act by transferring message relay responsibilities to telephone companies.

On September 13, 1993, an application was filed at the Oklahoma Corporation Commission regarding TRS. On October 13, 1993, the OCC approved a three-year contract with Sprint to provide the State with unrestricted telecommunications relay service. The OCC Order also required each LEC to impose a monthly surcharge on each residential and business line. Per the OCC Order, the LECs are required to forward the amounts collected from this surcharge to the Oklahoma Telephone Association (OTA). The funds are then used by the OTA to fund and recover the costs of developing and providing TRS in Oklahoma. The OTA has continued to contract with Sprint for TRS services. The latest contract between Sprint and the OTA was executed November 15, 2011 and is effective through November 14, 2016.

Under OTAs agreement with Sprint, Sprint is contractually obligated to comply with all FCC regulations regarding TRS. One of these regulations requires that, if a state program exceeds the mandatory minimum standards for TRS prescribed by the FCC, the state program can in no way conflict with federal law. Thus Sprint is required to ensure that the TRS it provides to the OTA for its state TRS program does not conflict with federal law. Neither the OTA nor Sprint believes that, to the extent that Relay Oklahoma exceeds the FCC's mandatory minimum standards, the services that Relay Oklahoma provides conflict with federal law.

Please see copy of Oklahoma State Statute and Oklahoma Corporation Commission Order, found in Appendix I, which established funding for intrastate TRS service."

§63-2417. Duties and responsibilities of State Department of Rehabilitation Services.

The State Department of Rehabilitation Services is hereby directed to:

1. Provide for the availability, distribution and maintenance, at no cost to qualified individuals with hearing or speech disabilities, or both, telecommunication devices and ring-signaling devices compatible with the telecommunications relay services for deaf or hard-of-hearing and speech-impaired individuals requirements of the Americans with Disabilities Act of 1990 and regulations promulgated thereunder; and

2. Design and implement a needs assessment test so that individuals with hearing or speech disabilities, or both, are benefited by this program. Provided, however, that no equipment and maintenance shall be provided without charge for those individuals meeting more than two hundred percent (200%) of the income guidelines for food stamps. The State Department of Rehabilitation Services shall develop a sliding scale to provide equipment and maintenance to individuals exceeding the needs test specified by this paragraph.

Added by Laws 1986, c. 183, § 2, eff. July 1, 1986. Amended by Laws 1993, c. 364, § 19, emerg. eff. June 11, 1993; Laws 1994, c. 315, § 13, eff. July 1, 1994; Laws 1998, c. 246, § 25, eff. Nov. 1, 1998.

In addition, the mandate below describes how funds are collected from telecommunication users in the state of Oklahoma for the purpose of funding the Oklahoma Relay.

§63-2418. Telephone access line surcharge - Telecommunications for the Hearing Impaired Revolving Fund.

A. There is hereby imposed a surcharge of five cents ($0.05) per local exchange telephone access line per month to pay for the equipment and maintenance program provided for in Section 2417 of this title and to provide for other needed services for the deaf, severely hard-of-hearing, severely speech-impaired and deaf-blind programs administered through the Department of Rehabilitation Services, such surcharge to be paid by each local exchange subscriber to local telephone service in this state, unless such subscriber is otherwise exempt from taxation.

B. The surcharge shall be collected on the regular monthly bill by each local exchange telephone company operating in this state and shall be remitted quarterly to the Oklahoma Tax Commission no later than fifteen (15) days following the end of each quarter.

C. There is hereby created in the State Treasury the Telecommunications for the Deaf and Hard-of-Hearing Revolving Fund. The fund shall consist of monies imposed in subsection A of this section. All monies accruing to the fund are hereby appropriated and may be budgeted and expended by the Department of Rehabilitation Services. The fund shall be a continuing fund not subject to fiscal year limitations and expenditures from said fund shall be made upon warrants issued by the State Treasurer against claims submitted to the Director of State Finance for the purpose of implementation of this act.

Added by Laws 1986, c. 183, § 3, eff. July 1, 1986. Amended by Laws 1987, c. 5, § 140, operative March 31, 1987; Laws 1987, c. 196, § 17, operative July 1, 1987; Laws 1994, c. 315, § 14, eff. July 1, 1994; Laws 1998, c. 246, § 26, eff. Nov. 1, 1998.

§63-2418.1. Certified local exchange telephone companies - Compliance with federal legislation - Assessment of surcharge.

Each certified local exchange telephone company shall comply with the provisions of the Americans with Disabilities Act of 1990 and regulations promulgated thereunder relating to telecommunications relay services for deaf and hard-of-hearing and speech-impaired individuals and shall assess a surcharge to each customer on a per line per month basis to recover the costs associated with such compliance and advise the Commission of any changes.

Added by Laws 1994, c. 315, § 15, eff. July 1, 1994. Amended by Laws 1998, c. 246, § 27, eff. Nov. 1, 1998.

§63-2419. Collection of revenues to cease under certain conditions.

If the revenues collected under this act exceed the costs of operating the program provided for in this act, and if such excess at any time equals the three-year average of expenditures under this act then such collections shall cease until one half of such surplus has been exhausted.

Information below is also attached to copy on file, Appendix I

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, Relay Oklahoma contracts with Sprint who contributes and collects interstate funds through RLSA. It is the State's understanding that Sprint complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. Relay Oklahoma neither provides VRS services, nor contracts to provides VRS services and is exempt from this section...

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Relay Oklahoma works in conjunction with the TRS provider, Sprint, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Oklahoma customers also have the option of calling Sprint's 24-hour Customer Service department (1-800-676-3777), the Sprint Relay Program Manager or the Oklahoma Telephone Association to file complaints or commendations.

Relay Oklahoma has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Relay Oklahoma submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline. To see copies of the Complaint Log Summaries from 2008 through 2012, please refer to Appendix J.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Relay Oklahoma through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

Relay Oklahoma/Sprint Relay met and exceeded all FCC mandatory minimum standards for approval of TRS Certification Renewal by the FCC in 2008.

 For a copy of this letter, please see Appendix M

§64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

Oklahoma Telephone Association awarded a contract with Sprint Relay in September 2011 and which takes effect starting November 2011 to 2016. Oklahoma Relay continues to meet and exceed all FCC requirements to provide Relay service.

Please see attachment Appendix N